

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JPMORGAN CHASE BANK, N.A., :
 : Case No.: 2:10-CV-06141 (WJM) (MF)
 :
 Plaintiff, :
 :
 : **[PROPOSED] ORDER**
 :
 v. :
 :
 :
 REPUBLIC MORTGAGE :
 :
 INSURANCE COMPANY and :
 :
 REPUBLIC MORTGAGE :
 :
 INSURANCE COMPANY OF :
 :
 NORTH CAROLINA, :
 :
 :
 Defendants. :
 :
 :

This matter coming to be heard on Defendants' Motion to Enjoin or Stay Arbitration, and this Court having considered the papers and argument presented in connection therewith; and for good cause shown, IT IS

HEREBY,

ORDERED that Defendants' Motion to Enjoin or Stay Arbitration is granted; and

ORDERED that Plaintiff has waived its right to arbitrate through its litigation conduct; and

ORDERED that Plaintiff is enjoined from proceeding with Case No. 13 195 01260 12 before the American Arbitration Association.

[OR ALTERNATIVELY] ORDERED that Case No. 13 195 01260
12 before the American Arbitration Association is stayed pending entry of a
final judgment in this action.

Entered on this ____ day of _____, 2012.

Hon. William J. Martini, U.S.D.J.

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